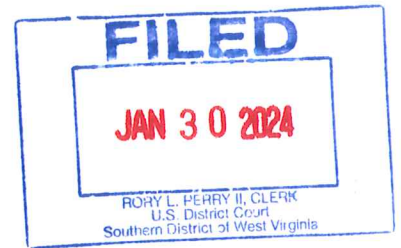


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:24-cr-0020
18 U.S.C. § 371

KRISTAN JOHNSON

I N F O R M A T I O N

The United States Attorney Charges:

From on or about January 1, 2020 to on or about February 16, 2022, at or near Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia and elsewhere, defendant KRISTAN JOHNSON and a person known to the United States Attorney ("Known Person One"), together with others both known and unknown to the United States Attorney, knowingly and intentionally conspired to commit violations of 18 U.S.C. § 1955, that is, to knowingly and intentionally conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business.

BACKGROUND

1. Known Person One was the owner and manager of an illegal gambling business (the "business"), which operated continuously during the timeframe of the conspiracy and was comprised of five

or more persons who conducted, financed, managed, supervised, directed, or owned all or part of the business.

2. The business primarily conducted online "pull tab" games, which were for-profit games of chance conducted in violation of the laws of the State of West Virginia, W. Va. Code §§ 61-10-1 *et seq.*

3. Defendant KRISTAN JOHNSON was an online host for the business who accepted wagers from customers, conducted pull tab games, and paid out prize money to customers. The customers were located throughout the United States and elsewhere.

OVERT ACTS OF THE CONSPIRACY

In furtherance of the conspiracy and to achieve its objectives, defendant KRISTAN JOHNSON committed the following overt acts at various times between January 1, 2020, and February 16, 2022, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia and elsewhere:

1. Known Person One transferred money to Defendant KRISTAN JOHNSON as compensation for moderating pull tab gambling games in the group owned and managed by Known Person One, including on or about May 22, 2021.

2. Defendant KRISTAN JOHNSON sent and received money to and from individuals placing wagers in the pull tab gambling games

conducted by the defendant in the group owned and managed by Known Person One, including on or about July 10, 2020.

3. Defendant KRISTAN JOHNSON regularly purchased gambling supplies for use in the pull tab gambling games conducted by the defendant in the group owned and managed by Known Person One.

All in violation of Title 18, United States Code, Section 371.

UNITED STATES OF AMERICA

WILLIAM S. THOMPSON
United States Attorney

By:

A handwritten signature in black ink, appearing to read "Andrew J. Tessman", written over a horizontal line.

ANDREW J. TESSMAN
Assistant United States Attorney